

REMARKS

Claims 2, 4, 7, 8, 10, 12, 15, 16, 18, 20, 23, 24, 30, 36, and 42 have been amended. Claims 44-67 have been withdrawn. Claims 2-43 are currently pending in the application.

The Examiner rejected claims 2-3, 5, 7-11, 13, 15-19, 21, and 23-43 under 35 U.S.C. § 102(b) as being anticipated by Judice (USPN 3,937,878). The Examiner objected to claims 4, 6, 12, 14, 20, and 22. Applicant respectfully traverses the rejection and objection and requests reconsideration of the application.

In order for a reference to anticipate an invention, each and every element of the claimed invention must be found in a single reference. "Moreover, it is incumbent upon the examiner to identify wherein each and every facet of the claimed invention is disclosed in the applied reference." Ex parte Levy, 17 USPQ2d 1461, 1462 (Bd Pat App & Inter 1990). Applicant respectfully submits that Judice does not anticipate Applicant's claimed invention because Judice does not teach or disclose each and every element of the claimed invention.

Applicant's independent claim 1, as amended, recites in relevant part "halftoning the input image by applying one of at least two halftone techniques to the plurality of pixels in the input image, wherein each halftone technique has at least one non-locational halftone parameter that differs from the non-locational halftone parameters in the other halftone techniques." Independent claims 10 and 18 include similar language. Judice does not teach this aspect of the claimed invention. Judice uses a single dither matrix with the same dither threshold values to halftone an image. Every pixel in the image is assigned a corresponding dither threshold value from the dither matrix, and that same dither threshold value is used when the pixel is first halftoned and during any subsequent "conditional replenishment" halftoning. "Conditional replenishment" halftones only a portion of pixels when that

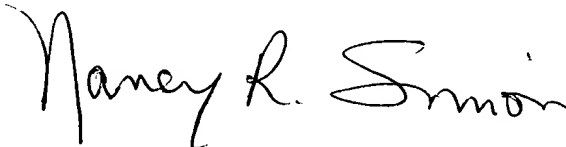
portion changes from the previous image (see col. 2, line 60 to col. 3, line 2; col. 3, line 63 to col. 4, line 8; and col. 4, line 42 to col. 5, line 8)). Judice does not teach or disclose applying one of two or more halftone techniques to the plurality of pixels in an image where each halftone technique has at least one non-locational halftone parameter that differs from the non-locational halftone parameters in the other halftone techniques.

"Claims in dependent form shall be construed to incorporate by reference all the limitations of the claim incorporated by reference into the dependent claim." 37 CFR 1.75. Therefore, claims 3, 5, 7-9, and 26-31 include all the limitations of claims 2, claims 11, 13, 15-17, and 32-37 include all of the limitations of claim 10, and claims 19, 21, 23-25, and 38-42 include all the limitations of claim 18. For at least the reasons discussed above, Judice does not anticipate independent claims 2, 10, and 18. Accordingly, dependent claims 3, 5, 7-9, 11, 13, 15-17, 19, 21, 23-43 are also not anticipated by Judice.

In light of the discussion above, Applicant believes that all claims currently remaining in the application are allowable and respectfully requests allowance of such claims.

Respectfully submitted,

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A handwritten signature in black ink that reads "Nancy R. Simon". The signature is written in a cursive, flowing style.

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